

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

KIMBERLY ALLEN, Personal
Representative of the ESTATE
OF TODD ALLEN, Individually,
on Behalf of the ESTATE OF
TODD ALLEN, and on Behalf of
the Minor Child PRESLEY
GRACE ALLEN,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendant.

Case No. A04-0131 (JKS)

VIDEOTAPED DEPOSITION OF DONNA A. FEAREY

Pages 1 - 102, inclusive

Monday, April 11, 2005, 1:53 p.m.

Anchorage, Alaska

Alaska Stenotype Reporters

511 West Ninth Avenue

Anchorage AK 99501-3520

Serving Alaska Since 1953

Rick D. McWilliams, RPR, Ret.
Fred M. Getty, RPR, Ret.

Telephone 907.276.1680
Email AkSteno@aol.com
Fax 907.276.8016

Donna Fearey

Deposition

April 11, 2005

Page 53	Page 55
<p>1 important?</p> <p>2 A. Because of the -- because when somebody has</p> <p>3 a severe headache and -- and is vomiting, that can be</p> <p>4 an indication that they have got increased pressure in</p> <p>5 their head --</p> <p>6 Q. Okay.</p> <p>7 A. -- and that causes them to vomit.</p> <p>8 Q. Increased pressure, would that be -- and are</p> <p>9 you talking about increased --</p> <p>10 A. Like from a bleed --</p> <p>11 Q. -- cranial pressure?</p> <p>12 A. -- from a bleed or tumor.</p> <p>13 Q. Okay. Would it be clinically significant to</p> <p>14 you if somebody with a chronic pain problem presenting</p> <p>15 at the ER with a severe headache, that -- that the</p> <p>16 pain would be different than something they had</p> <p>17 experienced before?</p> <p>18 A. Can you say that -- I'm not sure --</p> <p>19 Q. Yeah. If somebody with chronic pain</p> <p>20 presents, they've got a severe headache, but the pain</p> <p>21 they're describing -- they describe it as something</p> <p>22 different than what they had experienced in the past.</p> <p>23 A. Uh-huh.</p> <p>24 Q. And --</p> <p>25 A. Yes.</p>	<p>1 you say the clerk, is there somebody sitting --</p> <p>2 A. I -- yeah. I -- I -- I would think it would</p> <p>3 be the clerk. It could be the nurse but...</p> <p>4 Q. And the clerk, is that just somebody who</p> <p>5 sits -- somebody sitting at the desk --</p> <p>6 A. Yeah.</p> <p>7 Q. -- who is receiving patients who come in?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Okay. And so room number 13, is that -- is</p> <p>10 that --</p> <p>11 A. That's the room I saw him in.</p> <p>12 Q. Okay. And is that -- that's a room on the</p> <p>13 urgent care center side?</p> <p>14 A. Uh-huh.</p> <p>15 Q. And then whose handwriting is under the</p> <p>16 chief complaint/triage subjective, at the top, if --</p> <p>17 if you know?</p> <p>18 A. Pat Ambrose.</p> <p>19 Q. Okay. And my understanding is Pat</p> <p>20 Ambrose -- well, that's all right. I can ask another</p> <p>21 witness that. Did she write in this top box that --</p> <p>22 from "chief complaint/triage subjective" to "triage</p> <p>23 objective"?</p> <p>24 A. Yes.</p> <p>25 Q. Did you write in that box at all?</p>
Page 54	Page 56
<p>1 Q. Yeah. Okay. I want to just go to -- or</p> <p>2 maybe I haven't given it to you. I'm going to give --</p> <p>3 I'm just going to show you what's -- it's already been</p> <p>4 marked as an exhibit. It's -- it's Exhibit 8. And is</p> <p>5 this the -- the note from April 19th --</p> <p>6 A. Yes.</p> <p>7 Q. -- from the -- the visit with Todd Allen in</p> <p>8 the UCC?</p> <p>9 A. Yes.</p> <p>10 Q. And if you can tell me what -- let's see.</p> <p>11 And show you what -- am I here? Thank you.</p> <p>12 (Exhibit 11 marked.)</p> <p>13 BY MS. McCREADY:</p> <p>14 Q. And then I have just marked as Exhibit 11,</p> <p>15 you know, a typewritten sheet. And have you seen that</p> <p>16 before?</p> <p>17 A. Yes.</p> <p>18 Q. Did you prepare that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. I appreciate you preparing that.</p> <p>21 Whose handwriting is at the top of the -- let's -- let</p> <p>22 me just go through this. On the arrival time, who</p> <p>23 would have written that down?</p> <p>24 A. A clerk.</p> <p>25 Q. And -- and the clerk or -- or is it -- when</p>	<p>1 A. Yes -- no.</p> <p>2 Q. Okay. And how about to the -- to the right</p> <p>3 of that, in the box that says temp, pulse --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- respirations? Would that be your</p> <p>6 handwriting, or is that --</p> <p>7 A. No. That's Pat's.</p> <p>8 Q. That's Pat's. Okay. How about on this far</p> <p>9 right-hand side where it says blood pressure, weight,</p> <p>10 allergies? Who -- who took that down?</p> <p>11 A. Blood -- the blood pressure she would have</p> <p>12 written. The allergies, the "ASA" is her writing, but</p> <p>13 questionable PCN is mine.</p> <p>14 Q. Okay. And what is -- I'm just curious.</p> <p>15 What's questionable PCN?</p> <p>16 A. I'm not sure if he had an allergy to</p> <p>17 penicillin or not.</p> <p>18 Q. All right. And then the disposition of the</p> <p>19 case, would that be your writing or -- or --</p> <p>20 A. No. That would be the LPN.</p> <p>21 Q. This is the LPN. Okay. And how about --</p> <p>22 again, right below the "Disposition of Case, Acuity</p> <p>23 Level, Scheduled Visit," it says "ER visit." Who --</p> <p>24 who would -- whose handwriting is that?</p> <p>25 A. The circle?</p>

17 (Pages 53 to 56)